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*Attorneys for Broad-Bussel Limited Partnership,  
 Marie Louise Michelsohn, Michelle Michelsohn  
 and Herbert Blaine Lawson, Jr., individually and  
 on behalf of all other persons and entities similarly situated*

UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK

	X
In re:	:
BAYOU GROUP, LLC, <i>et al.</i> ,	:
Debtors.	:

X

**MOTION OF CLASS PLAINTIFFS TO PARTIALLY WITHDRAW  
 THE REFERENCE OF THE BAYOU BANKRUPTCY CASES  
 PURSUANT TO 28 U.S.C. § 157(d) AND FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 5011(a)**

The Class Plaintiffs, Broad-Bussel Family Limited Partnership, *et al.* (“Class Plaintiffs”),<sup>1</sup> individually and on behalf of other similarly situated persons and entities

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<sup>1</sup> The “Class Plaintiffs” consist of the Broad-Bussel Family Limited Partnership, Mary Louise Michelsohn, Michelle Michelsohn and Herbert Blaine Lawson, Jr., individually and on behalf of all similarly situated Bayou hedge fund investors, in the proceedings captioned Broad-Bussel Family Limited Partnership, et al. v. Bayou Group LLC, et al., Civil Action No. 06 Civ. 3026 (CM) (S.D.N.Y.) (the “Class Action”). The Class Action is pending before Judge Colleen McMahon in the United States District Court for the Southern District of New York (the “District Court”) and the parties there are presently briefing motions to dismiss.

who, during the period December 31, 1996 through August 25, 2005 were damaged by investing in one or more of the Bayou ("Bayou") family of hedge funds, hereby file this Motion to partially withdraw the reference of the pending bankruptcy proceedings, jointly administered at Case No. 06-22306, pursuant to 28 U.S.C. § 157(d) and Federal Rule of Bankruptcy Procedure 5011(a). Specifically, the Class Plaintiffs seek the withdrawal of the reference of the Motion of Class Plaintiffs for Declaratory Relief, which has been filed with the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") concurrently herewith. In support thereof, the Class Plaintiffs refer the Court to their Memorandum of Law submitted contemporaneously herewith and all prior proceedings herein.

Dated: August 15, 2006  
New York, NY

Respectfully Submitted,

ADELMAN LAVINE GOLD AND LEVIN,  
A Professional Corporation

By: /s/ William R. Hinchman

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Jr., individually and on behalf of all persons and  
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